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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emission Standards into Procurement Policies.	)))))	R.06-04-009

BEFORE THE CALIFORNIA ENERGY COMMISSION

In The Matter Of, AB 32 Implementation – Greenhouse Gas Emissions.	)))))	Docket 07-OIIP-01

REPLY BRIEF OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON POINT OF REGULATION ISSUES

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Southern California Edison Company ("SCE") submits these comments in response to issues raised by parties responding to the Administrative Law Judge's Ruling Requesting Comments on Type and Point of Regulation Issues, issued November 9, 2007. SCE's comments herein incorporate by reference its previous comments on point of regulation issues submitted to the California Public Utilities Commission ("CPUC") in this docket on August 6, 2007, August 15, 2007, and December 3, 2007.

I.

THE CPUC SHOULD REJECT CONTINUED INACCURATE CHARACTERIZATIONS OF THE FIRST SELLER PROPOSAL

A. The Resero Report Incorrectly Assesses the First Seller Proposal

The First Seller Design Description by Resero Consulting (the "Resero Report")[1] makes two important errors when characterizing the deliverer/first seller ("First Seller") proposal. Each of these errors is addressed below.

1. The Economic Burden of an Emissions Cap is Not Solely Born by Regulated Entities

The Resero Report incorrectly assumes that a load-based proposal more easily supports allocating allowances to load serving entities ("LSEs"). This assumption is correct only if one erroneously presumes that only entities regulated under the GHG regulations suffer economic harm under an emissions reduction regulation. This presumption was precisely the flaw in the allocation scheme designed under the European Union Emissions Trading Scheme ("EU-ETS"). These regulators determined that only regulated entities (in the EU-ETS, this meant generators) should receive allocations. However, experience demonstrated that while retail providers were not regulated in the EU-ETS, ratepayers bore a significant economic burden, along with generation.

Allocating allowances solely to LSEs under a load-based approach results from the same erroreous thinking. Under a load-based cap, LSEs would be the regulated entities. However, under such an approach, LSEs will not be the only harmed entities. While some parties may feel that allocating allowances solely to LSEs under a load-based approach is appropriate, such an allocation scheme suffers from flaws similar to those contained by the EU-ETS approach.

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[1] The Resero Report is attached as Attachment A to the Administrative Law Judge's Ruling Requesting Comments on Type and Point of Regulation Issues, issued November 9, 2007.

SCE has offered an allowance allocation mechanism that will more fairly mitigate the economic burden of Assembly Bill 32 ("AB 32"). SCE's proposal would allocate allowances according to economic harm.[2] Such a principled approach acknowledges that allowances cannot only be allocated to LSEs.

While the Los Angeles Department of Water and Power ("LADWP") and Southern California Public Power Authority ("SCPPA") may prefer that the entire value of allowances be allocated to LSEs, regardless of the point of regulation, such a suggestion ignores previous experience and the reality that the economic burden of emissions reductions is not solely born by regulated entities.

2. The Point of Regulation is Independent of the Allowance Allocation Mechanism

The SCE allocation proposal does not depend on any specific point of regulation under a cap-and-trade system. The LADWP and SCPPA each support a load-based cap-and-trade policy as a means to ensure that allowances are freely allocated solely to retail providers. Further, LADWP and SCPPA have suggested that a First Seller approach should not be adopted because allowance value cannot be transferred to ratepayers under such a proposal. However, under SCE's allocation proposal, allowance value is delivered to entities according to the economic harm suffered. SCE's allocation proposal does not depend on the point of regulation. Indeed, under SCE's allocation proposal, a significant share of allowance value would be returned to ratepayers. Because the economic burden of emissions regulation spans both regulated[3] and unregulated entities, the allocation scheme is independent of the point of regulation. SCE further suggests that the determination of regulatory structure (load-based vs. source-based) is a critically important challenge that warrants specific attention and must not be confused by stakeholders' self-interests in achieving a specific allocation outcome. An optimal allowance

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[2] SCE Opening Comments at 12.

[3] In this case, "regulated" entities means entities that are subject to GHG regulations, and not entities that are regulated by the CPUC.

allocation plan will minimize the cost of emission reductions, demonstrate California's commitment to innovation and infrastructure investment, and will maintain the incentive to reduce emissions through the price of emissions.

B. LADWP and SCPPA Incorrectly Interpret the Resero Report

A First Seller approach holds significant advantages over a load-based approach for in-state resources while not placing at a disadvantage a load-based approach for imported energy. Although SCE finds two errors in the reasoning in the Resero Report, LADWP and SCPPA misinterpret many results with respect to the report.

SCPPA offered numerous references to the Resero Report which attempt to confuse the comparison by indicating that there is no advantage to a First Seller approach over a load-based approach.[4] However, as originally cited in the California Market Advisory Report, *Recommendations for Designing a Greenhouse Gas Cap and Trade System for California*, ("MAC Report"), one of the primary advantages of a First Seller approach is that it offers significant improvements over a load-based model for in-state resources. Insofar as imported energy is concerned, the MAC Report finds no significant differences between the two approaches. The MAC Report states:

> The (Market Advisory) Committee encourages the three California agencies that are partners in the regulation of the electricity industry to develop a extensive plan for how to account for emissions associated with imported power. *This accounting would be necessary under either a load-based or first-seller approach*.[5]

The MAC Report also concludes that:

> Neither approach seems clearly superior to the other in terms of its ability to control leakage. Both would have to rely on information provided under contracting mechanisms that bring power into California to account for out-of-state emissions and both rely on some degree of approximation to establish the emissions intensity of power received at the border.[6]

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4 SCPPA Opening Comments at 22-25.
5 MAC Report at 44 (emphasis added).
6 *Id.*

Both the MAC Report and the Resero Report identify challenges involved in measuring, reporting and tracking emissions from imported energy regardless of the point of regulation. Although the First Seller approach and load-based approach both face this challenge for imported energy, the First Seller approach offers significant and substantial improvements over a load-based cap for in-state generation. This is one of the reasons why the First Seller approach is preferable to a load-based cap.

SCPPA also cited comments in the Resero Report that under a First Seller approach, "the points of regulation for imports constitute a much larger set of entities with more diverse business interests."[7] SCE fails to see the direct relevance of this comparison. Consider, for example, the comparison between the First Seller approach and the load-based approach as it applies to in-state generation. A First Seller model creates a much larger set of regulated entities (as in-state sources) than would a load-based approach. However, while some may choose to ignore the significant benefits of a First Seller approach over a load based approach for in-state resources, the advantage of a First Seller approach for in-state resources is widely understood. These benefits include more transparent reporting and tracking of in-state emissions, the ability to include emissions value in energy bids to the California Independent System Operator ("ISO"), and a far more straightforward linking and coordination with a regional or national program. The First Seller approach is easier to administer in-state, does not require the use of any emissions factors for in-state resources, and as a result has greater environmental integrity than a load-based approach. Referencing the number of points of regulation as an indictment of a First Seller approach relative to a load based approach is at best simplistic and at worst misleading.

The Resero Report referred to a process of using a contract-path method of attributing carbon from imports, stating that because the number of regulated entities is smaller under a load-based model, there would be less effort required to do so under a load-based program. In other words, the same contract path method would be required under a load-based program, but because there would be fewer points of regulation, there would be less effort in the accounting. However, the Resero

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[7] Resero Report at 2, *as cited by* SCPPA Opening Comments at 23.

Report did not justify or quantify the added challenge created by the greater number of regulated entities. Additionally, in its presumption that the regulated entities would be less stable under a First Seller approach, the Resero Report did not offer any quantification or magnitude on which to reasonably base an assessment. SCE is not convinced that such a simplistic metric is anything more than a red herring. The important metric for tracking imported carbon is the carbon source.

AB 32 challenges California to develop real emission reductions when, as it stands, there is no regional or federal emissions cap. While the load-based cap may have been a reasonable first attempt to reduce emissions from energy imports into California, such a program comes with significant handicaps, particularly insofar as in-state resources are concerned. The First Seller approach addresses the obstacles created by a load-based approach insofar as the in-state resources are concerned, while allowing California to include emissions from imported energy under the cap similarly to a load-based approach. SCPPA recognizes this in a comment from the Resero Report cited in its Opening Brief:

> There are first sellers for whom no E-Tag is available. For these first sellers, there will need to be some method to determine "Carbon Impacts," and the first seller approach will most likely "resemble a load-based approach," in which case the first-seller approach will offer no advantage over the load-based approach.[8]

As stated in the MAC Report, the First Seller approach is an improvement over the load-based approach in its treatment of in-state resources, and produces similar results to a load-based cap insofar as imports are concerned. While SCE commented on the Resero Report's characterization of allowance allocation, it finds the Resero Report's reference to a larger set of regulated entities irrelevant. However, the Resero Report describes a key advantage of the First Seller approach--that in-state generator bids will reflect carbon costs.[9] It appears that it is SCPPA's intent to criticize the First Seller approach by indicating that a First Seller approach provides no clear advantage over a load-based approach for imported energy. However, in doing so, SCPPA has completely ignored the significant and important benefits that a First Seller approach holds for in-state resources.

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[8] *Id.*

[9] Resero Report at 12.

In addition to the Resero Report and the MAC Report, the California Independent System Operator's Market Surveillance Committee ("ISO-MSC") has commented on the value of a First Seller approach insofar as market coordination is concerned. In its "Final MSC Opinion on Load-Based and Source-Based Trading of Carbon Dioxide in California" ("MSC Opinion"), the ISO-MSC very clearly described the overwhelming challenge that a load-based cap would create under market dispatch rules. While a large share of SCPPA members may operate outside of the ISO, SCE urges the CPUC to recognize that ignoring the implications that regulatory schemes have on the broad electricity market in California is not particularly helpful.

C. Energy Efficiency, RPS, and other California Programs Need Not Be Discarded If the First Seller Approach is Adopted

LADWP and Sacramento Municipal Utility District ("SMUD") suggest that a load-based approach is more consistent with other California measures, such as energy efficiency and renewable measures. However, the impact on such programs should not be any different under the First Seller approach than under a load-based approach.

The California renewable portfolio standard ("RPS") requires that select retail providers procure 20% of their retail energy load from certified renewable resources by 2010. SCE supports this statute and is diligently working toward achieving full compliance. SCE further suggests that a broad implementation of the RPS, including municipal utilities, is an important element in reducing greenhouse gas ("GHG") emissions. SCE sees no conflict between the California RPS and a First Seller cap-and-trade program under AB 32. The MAC Report noted that, for currently regulated facilities, imposing a cap-and-trade program will not cause an increase in emissions. The interaction of programmatic regulations with a First Seller cap-and-trade does not imply that the programmatic solutions can, or should, be abandoned. A First Seller cap-and-trade program will not, for example, preclude compliance with the California RPS.

In addition, some stakeholders imply that a First Seller or source-based cap will reduce the incentive for energy efficiency. However, there is no link between incentives for continued

and additional energy efficiency and the point of regulation under AB 32. Because the cost of providing energy to retail customers will increase by the same amount under either the load-based or First Seller model, the incentive value of additional energy efficiency will be the same. Specifically, as the market price of energy increases under a First Seller approach, more energy efficiency projects will become cost effective. SCE encourages the CPUC to dismiss any concerns regarding coordination of a First Seller cap-and-trade program with existing programmatic regulations.

D. Power Exchanges and Swaps Can Be Addressed Under A First Seller Mechanism

SMUD has accurately noted that energy swaps offer an "efficient use of resources in California and other states."[10] SMUD implies that the lack of an appropriate accounting method for such energy swaps under a First Seller approach indicates that a First Seller model may cause an inefficient build out of generating resources. SMUD has further commented that generation should only be counted once, and that a First Seller program must identify a means to ensure that generation is not double counted. SCE suggests that SMUD is unnecessarily confusing the issue. Energy swaps will require an accounting treatment under either a First Seller or a load based cap. Under a First Seller approach, SCE considers the most appropriate treatment of emissions resulting from an energy swap to be a distinct split of the transaction. Under either a First Seller or a load based cap, a means of accounting for imports must be developed. Such a process, under either point of regulation, would need to identify whether the energy was produced by a generator operating under a cap. This accounting burden does not significantly change whether the point of regulation is load-based or First Seller. The energy exported under the swap should be treated identically to any energy exports under a First Seller approach. By separating the transaction into two components, consistency can be maintained under a First Seller approach and California would minimize the risk of double counting emissions.

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[10] SMUD Opening Comments at 9.

E. The Federal Power Act Is Not A "Significant Flaw" In The First Seller Proposal

LADWP asserts that the likelihood of the First Seller proposal being challenged as an improper violation of the Federal Power Act ("FPA") creates a "significant flaw" in the First Seller proposal. As SCE has previously noted, LADWP's assessment of the First Seller proposal as it relates to the FPA is too simplistic and does not take into consideration the subject matter scope of Federal Energy Regulatory Commission's ("FERC" or "Commission") regulation of wholesale sales under the FPA. SCE briefly reiterates why LADWP and others who assert that the FPA is a significant flaw are wrong.

Quite simply, environmental regulation of first sellers would not intrude on FERC's jurisdiction. SCE agrees that in those subject areas in which FERC has been granted jurisdiction to regulate wholesale sales, that jurisdiction is exclusive and preempts state regulation of the same subject area. The key point here is that California is proposing to regulate the environmental effects of energy sales, and the FERC's jurisdiction does not extend to regulation of the environmental effects of wholesale sales. The fact that the State's regulation is imposed on electricity sellers, and therefore may impose requirements on some wholesale transactions that FERC regulates *for other purposes,* does not establish preemption because the State is regulating in a field that Congress did not occupy in the FPA. In addition, the California environmental regulatory program would not interfere with FERC's regulation of wholesale sales under the FPA, so there is no conflict between State and federal regulatory regimes.

Preemption can occur in two circumstances. First, it can be shown that Congress intended to fully "occupy" a field of regulation, such that there is no room for State regulation of the same field. *E.g.*, *Nw. Cent. Pipeline Corp. v. State Corp. Comm'n of Kan.*, 489 U.S. 493 (1989). Second, "conflict" preemption may exist where the state regulatory regime stands as an obstacle to accomplishment of Congress' statutory objective or when simultaneous compliance with the federal and state regulatory regimes is not possible. *E.g., Fla. Lime & Avocado Growers v. Paul*, 373 U.S. 132 (1963).

As noted above, the courts have held that states may not regulate the rates and service terms of wholesale electric power sales because the FPA fully occupies this field and preempts state action. The cases holding that the FPA preempts state regulation, however, are uniformly in the context of state actions that amounted to the regulation of the *economic terms* of the wholesale transaction. No case holds, and nothing in Part II of the FPA or its legislative history suggests, that Congress intended to occupy the field of environmental regulation, which is the sole purpose of the California law at issue here.

To the contrary, in *Grand Council of the Crees v. FERC*, 198 F.3d 950 (D.C. Cir. 2000), the court upheld the FERC's decision not to consider environmental claims related to a wholesale power sale. The court noted that FERC's purpose in regulating wholesale sales under the FPA was to balance the economic interests of investors and consumers, and that environmental regulation was "orthogonal" to these statutorily protected interests. *Id.* at 958.[11] Consistent with this decision, the Commission has affirmatively foresworn consideration of environmental matters as beyond the Commission's authority to consider under Sections 205 and 206 of the FPA. *PSI Energy, Inc.*, 55 FERC ¶ 61,254 at 61,811 (1991).

In *Edison Electric Institute*, 69 FERC ¶ 61,344 (1994), the Commission declined to assert Section 203 or Section 205 jurisdiction over emissions allowances, holding that such allowances are equivalent to interests in fuel supplies used in the generation of electricity over which the Commission does not have jurisdiction. The Commission rejected the argument that the Commission should assert jurisdiction because the cost of the allowances might affect wholesale rates, holding that this was true with respect to the cost of fuel as well. FERC's jurisdiction was protected by the fact that it retained the ability to review the reasonableness of the compliance costs included in wholesale rates, just as it reviews the reasonableness of fuel costs.

The Commission has also disclaimed jurisdiction over state environmental regulations that limit the ability of generators to supply power to the wholesale market. California has, for

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[11] The principle that FERC regulation under Part II of the FPA does not extend beyond the economic terms of transactions was first established by the Supreme Court in *NAACP v. FPC*, 425 U.S. 662 (1976), in which the Court held that, except for considering whether costs could be included in rates, discrimination issues were beyond FERC's purview under the FPA.

years, regulated the emissions of wholesale generators. California imposes NOx caps on generators and operates a cap-and-trade program. FERC has held that the setting of these emissions caps is outside its FPA jurisdiction. In its orders concerning the "must-offer" requirement during the California power crisis, FERC said: "The question of whether such units can run outside of their prescribed [emissions] limits . . . [is] within the control of the state."[12]

Virtually all of the states also grant permits and certificates that generators must obtain in order to site their facilities and operate consistent with state environmental and land use policies. Those certificates can contain construction conditions and operating limits, including emissions limits, that directly affect the price and availability of wholesale power. These certificates are required even where the plant is certified as an exempt wholesale generator, and therefore sell exclusively at wholesale. It has never been suggested that such state siting laws that may affect the price and availability of wholesale power are or could be preempted.

Emissions allowances can also be analogized to a state tax on the sale of electricity. Several states impose gross receipts or excise taxes on the revenues utilities earn on their FERC-jurisdictional wholesale sales. FERC permits those state-imposed costs to be passed through, dollar-for-dollar, in wholesale rates and has never suggested that such state taxes are preempted even though they affect the level of wholesale rates. *E.g., City of Cleveland v. Cleveland Elec. Illuminating Co.,* 12 FERC ¶ 61,163 (1980); *Philadelphia Elec. Co*., 10 FERC ¶ 63,034, *affirmed*, 13 FERC ¶ 61,057 (1980).

The Supreme Court, in the context of reviewing a preemption challenge under the Natural Gas Act ("NGA"), stated that "every state statute that has some indirect effect on rates and facilities [subject to FERC's jurisdiction] is not preempted." *Schneidewind v. ANR Pipeline Co*.,

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[12] *San Diego Gas & Elec. Co. v. Sellers,* 99 FERC ¶ 61,205 at 61,843 (2002). FERC was quoting from an earlier decision in the case (96 FERC ¶ 61,117 at 61,448) where it said:

> The [FERC] has addressed everything within its jurisdiction to maximize the output of much needed generation in California, including the must offer requirement. Issues related to compliance with the Clean Air Act certificate are subject to either local, state or other federal agency jurisdiction. We urge the EPA and the state to work out administrative provisions that would enable these units to run.

485 U.S. 293, 308 (1988). The issue for preemption purposes is whether the state is attempting to regulate within the "exclusively federal domain." *Id.* at 305. Although the Court found preemption in *Schneidewind,* it did so only after carefully comparing the challenged state statute to specific regulatory authorities granted to FERC in the NGA and finding that the state statute regulated the very same subject matter, with the same intended purpose. *Id.* at 307-09. In contrast, California's GHG regulation is unrelated to any subject area that FERC regulates and is not designed to accomplish any regulatory purposes covered by Part II of the FPA.

The Supreme Court's decision in *Pac. Gas & Elec. Co. v. State Energy Res. Conservation & Dev. Comm'n,* 461 U.S. 190 (1983) is also instructive. In that case, the Supreme Court held that California's law prohibiting the construction of new nuclear plants in the State was not preempted by the Atomic Energy Act because the California law was premised on economic concerns associated with nuclear power rather than radiation hazards. Thus, while the Atomic Energy Act gave the Nuclear Regulatory Commission exclusive jurisdiction to consider the health and safety effects of nuclear power, it did not occupy the field of economic regulation of nuclear power, and the State retained the right to regulate in this arena. The converse is true in this case. Although the FPA gives FERC exclusive jurisdiction over the economics of wholesale transactions, it does not cover environmental effects of such transactions and therefore State laws regulating such environmental effects are for a different purpose and do not intrude on the field occupied by the federal government.

Finally, there is no basis for finding conflict preemption here. California's regulation of GHG emissions will not interfere in any way with FERC's exercise of its economic jurisdiction over wholesale sales and will not conflict with any of FERC's regulatory objectives. California does not propose to interfere with FERC's jurisdiction to review the reasonableness of rates, including the costs of GHG emission allowances that may be part of the cost of service. Moreover, to the extent that any such conflict could be identified, it would be the same whether California chooses to regulate LSEs or "first sellers." Accordingly, concerns about conflict preemption are not a logical basis for choosing one form of GHG regulation over the other.

II.

A LOAD-BASED APPROACH IS NOT COMPATIBLE WITH NATIONAL AND INTERNATIONAL PROGRAMS

The question of a national emissions cap is increasingly becoming one of "when" such a regulation will be implemented and less a question of "if" such a regulation will be implemented. As such, California must pay careful attention to the coordination of statewide programs with an expected national program. The current discussion of national programs is focused only on source-based cap-and-trade programs. Such a source-based national program would create significant integration challenges for California if California chooses to implement a load-based cap-and-trade program. Under a source-based program, emission sources are required to provide an emissions allowance for each ton of emissions. However, under a load-based cap, retail electricity providers must provide the emissions allowances. Although the allowances under each program reference a ton of GHG emissions, the two programs would not integrate well together.

A. A Load-Based Program Requires Significantly More Complicated Emissions Tracking Systems

While a source-based program measures emissions at the source, and while this is currently done under the Continuous Emissions Monitoring Standard, a load-based program requires tracking these emissions to retail providers through a complicated web of transactions and relationships. The principle concern in a load-based only environment is that accurate tracking is impossible and, in many cases, arbitrary emissions factors must be used. While this concern should be sufficient to bring serious questions to a load-based system, overlaying a load-based system into a larger source-based system significantly increases the potential for double counting emissions. In other words, retail providers will likely be burdened with a requirement to provide allowances for energy that was capped at the source under the larger source-based program. Efforts to identify energy that was capped at the source and track this energy to the retail provider essentially double the effort required to track the energy from source to sink.

B. The British Experience Under the EU-ETS Demonstrates the Challenge of Integrating a Load-Based Program with a Larger Source Based System

Great Britain had a load-based cap prior to the development of the EU-ETS. As part of its agreement to participate in the EU-ETS, Britain successfully obtained a delay to afford time to dismantle its then existing load-based program and facilitate participation with the EU-ETS. Because the EU-ETS was not statutory, Britain was able to negotiate such a delay. It is not likely that California would be able to negotiate a delay or exception (nor would it reasonably want such an action) in the event that a national source-based cap is implemented. Additionally, the process of dismantling the British load-based program was politically and economically difficult as claims of ownership over existing allowances, as well as long term contracts had to be adjudicated. While there are a number of significant reasons to reject a load-based cap, the inability to interact with a national source based program is sufficient on its own merit to reject a load-based cap.

III.

LADWP'S SUGGESTION THAT EARLY ACTIONS SHOULD NOT BE RECOGNIZED IS CONTRARY TO AB 32

LADWP implies that an acceptable position is to take no action with regard to entities that took early actions in anticipation of a market-based cap-and-trade mechanism.[13] Such comments should be rejected as directly contrary to the explicit language of AB 32 which directs CARB "to the extent feasible . . . [e]nsure that entities that have voluntarily reduced their greenhouse gas emissions prior to the implementation of this section receive appropriate credit for such voluntary early actions."[14] Suggesting that there should be no recognition of parties' efforts to reduce their GHG prior to the implementation of AB 32 would have CARB deliberately ignore the Legislature's mandate.

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[13] LADWP Opening Comments at 25.
[14] Cal. Health and Safety Code §38562(b)(3).

IV.

CONSTELLATION'S ALLOWANCE ALLOCATION PROPOSAL SHOULD BE REJECTED

Constellation Energy ("Constellation") argues that under a cap-and-trade program, 50% of emission allowances should be allocated to emitting resources and the remaining 50% of allowances should be distributed via an auction. Constellation does not justify this arbitrary split between allocation and auction. Such an allowance allocation scheme will provide a large number of emitting resources with an unearned windfall at the expense of ratepayers. In a well designed cap-and-trade system, the market price for energy will include the emissions cost of the marginal generator. As a result, any allocation to a generator with emissions equal to, or less than the marginal unit would provide the generator with an unearned windfall. Generators that can recover the additional emissions expense in the electricity market should not receive any allowance allocation.

Constellation further argues that 50% of allowances should be auctioned. While Constellation's position would likely create an unearned windfall for generators, it would also impose an undue burden on ratepayers. Ratepayers will be burdened with an increase in electricity costs, and the Constellation proposal does not address this.

SCE has proposed an allowance allocation process that mitigates the economic harm to all regulated entities while avoiding an allowance windfall. In the SCE proposal, allowances should be allocated in such a way as to mitigate the economic displacement resulting from the emissions cap imposed by AB 32. As a result, those generators that cannot recover their emissions costs in the market would be allocated allowances to mitigate this added expense. Similarly, ratepayers should be allocated allowances to mitigate the additional burden of higher retail electricity prices. While the entire economic burden of compliance cannot be avoided, the allowance allocation proposal from SCE will reduce the burden to the greatest degree possible while retaining the emissions cost in the price of electricity.

Because the Constellation proposal provides for a significant windfall opportunity for generators at the expense of ratepayers, the CPUC should reject the Constellation allocation proposal.

V.

THE CPUC SHOULD REJECT THE CO_2RC PROPOSAL

While SCE appreciates the efforts put forth by Western Resource Advocates ("WRA") with their innovative CO_2RC proposal, SCE disagrees with the DRA assertion that the CO_2RC proposal should be considered further. The CO_2RC is extremely complex, does not work as a California-only system and will not integrate with any regional or federal GHG programs. SCE believes that any further time and energy spent on the CO_2RC proposal would be a distraction to the CPUC staff and would take away from more important tasks.

A. WRA's CO_2RC Proposal is Not Simple to Administer as the DRA Claims

The CO_2RC proposal is complicated, confusing and will be difficult to implement. Even a cursory summary of the proposal makes clear that administration of such a program will be full of technical challenges that will greatly burden regulators and their staffs.

1. The CO_2RC Proposal Is A Regional Program That Does Not Work As A California-Only System

As designed, the CO_2RC proposal is a regional program. Attempting to modify the proposal to work as a California-only program will be challenging and will negate many of the proposals purported benefits. For example, adjusting the proposal to a California-only program will force regulators "to escalate the CO_2RC requirements of their LSE's...."[15] These adjustments are needed to ensure real emission reductions. When adjusting the requirements, however, regulators will be caught between competing interests in a zero-sum negotiation between generators and LSEs.

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[15] WRA's CO_2RC Proposal at 9.

2. Regulators Will Have To Adjust CO_2RC Procurement Requirements For Load Growth Every Year

Another contentious issue that regulators will be forced to address is adjusting the procurement requirements for load growth. Again, this is a zero-sum game that will place regulators in the middle of a heated debate.

B. WRA's CO_2RC Proposal Creates the Potential for Economic Harm for LSEs with Low Carbon Portofolios.

LSEs that have already made substantial efforts to retire and replace high emitting generation with low emitting generation may find themselves being punished for their efforts under the CO_2RC proposal. Because the proposal requires all LSEs to procure CO_2RCs based solely on energy served (measured in MWh), entities that have undertaken significant efforts to reduce emissions would not reap any benefit from their early actions. This does not meet AB 32's requirement to recognize early actions.[16]

C. The CO_2RC Proposal Creates Issues Regarding Procurement Requirements For LSEs

The WRA proposal requires LSEs to purchase and retire CO_2RCs relative to a State's CO_2RC procurement requirement. Similar to the allowance allocation debates that center around who will receive the most allowances or value, the CO_2RC procurement requirement for LSEs will become a heavily contested issue because the potential positive or negative expected value for an entity will depend on how much the State escalates its requirements. Lower carbon emitting generators will seek higher CO_2RC procurement requirements, as those will increase demand and raise prices for CO_2RCs. On the other hand, LSEs will seek less stringent requirements, as such will reduce the amount of CO_2RCs an LSE will have to purchase. Further, higher carbon emitting generators will lobby for a less stringent requirement in order to minimize

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[16] Cal. Health and Safety Code §38562(b)(3).

the competitive advantage to be gained by clean generators. Accordingly, WRA's assertion that its proposal is somehow simpler or less contentious than others presented to date is misleading.

D. The CO_2RC Proposal Does Not Satisfy The In-State GHG Emissions Reductions Objective of AB 32

SCE has consistently supported the use of real, verifiable and additional emission offsets as a means to satisfy AB 32 emission reduction requirements. SCE supports the findings of the MAC Report on offsets:

> The sense of the Committee is that California should reject geographic or quantitative limitations on offset credits so as to maximize the opportunity to reduce GHG emissions at the lowest cost.[17]

The MAC Report further stated that the confidence that California has in such offset opportunities is important. A verifiable offset project can provide such confidence that California is absolutely funding real emission reductions that would not have occurred otherwise. However, the CO_2RC offers no such confidence. Because the CO_2RC proposal unbundles emissions from power, LSEs can purchase CO_2RCs from any generator that sells power in the Western Electricity Coordinating Council ("WECC").[18] Many of these generators are out-of-state and do not supply power to California. While SCE agrees with the MAC Report that emission reduction projects should be eligible regardless of geography, the CO_2RC proposal does not provide assurances out of state CO_2RCs create any real, verifiable or additional emission reductions. WRA suggests a solution to this problem is to only award CO_2RCs to generators that serve Western Climate Initiative load. However, this solution introduces the same issue faced by a load-based cap, namely the impossible task of linking loads to generation. Any regulatory scheme that requires tracking load to generation should be avoided at all costs.

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[17] MAC Report at 65.

[18] "Every generator, wherever located, receives credits based upon its CO2 emissions," CO_2RC Proposal at 8.

E. The CO_2RC Proposal Will Not Integrate With A Source-Based Regional/Federal Program

Although CO_2RCs use the same unit of measurement as allowances in other cap-and-trade programs (tons of CO_2e), the two allowance types are not interchangeable. CO_2RC allowances measure emissions reductions relative to a pulverized coal power plant. Other cap-and-trade allowances measure absolute emissions from any source. These two allowances are not fungible. Additionally, emission reductions relative to a coal plant have no relationship to other sectors such as manufacturing or transportation.

F. The CO_2RC Proposal Will Provide An Incentive for LSEs to Build Generation Instead of Contracting For It

Consider the following example: LSE A owns a portfolio of generating assets with some emissions profile, including many resources that are cleaner than coal. This LSE produces many of its own CO_2RCs from its portfolio, and depending on how clean that portfolio is, and what the CO_2RC requirements are, may or may not need to acquire additional CO_2RCs in the market. LSE B has a load identical to LSE A. LSE B has procured all of its needs through contracts with independent generators, some of which may be cleaner than coal. LSE B owns no generating assets, and thus produces none of its own CO_2RCs. LSE B incurs large costs to comply as it must purchase all of its CO_2RCs from the market. Furthermore, assume that the GHG emissions from LSE A's portfolio of owned resources are exactly the same as the portfolio from which LSE B purchases.

Under a load-based cap or a source-based cap, LSE A and LSE B would incur the same costs of compliance with the generation rules. They would each pay for their emissions as a buyer or as a generator, or through higher wholesale power prices, and in the end, since they have the same emissions and the same load, they would pay the same emissions cost. However, under the CO_2RC proposal, LSE A pays much less than LSE B because LSE A owned its generating resources while LSE B purchased its power from independent power producers. Going forward, such an outcome may not meet the CPUC's policy goals.

VI.

THE CPUC SHOULD REJECT THE TEAC PROPOSAL

A load-based cap-and-trade approach is significantly inferior to a First Seller based approach and a TEAC based approach to implementing such a program does not adequately address the problems which a load-based program creates. The TEAC proposal was an effort to address the significant challenge of integrating an emissions cost into the bid price of energy. However, the best way to address this is to implement a First Seller program. Under a First Seller approach, in-state generators, and first sellers of imported energy will incorporate their emissions cost into the bid directly. Under a TEAC approach, generators will not include their emissions costs into their bids because they will have no emissions costs. As a result, under Market Redesign and Technology Upgrade ("MRTU"), the ISO will dispatch according to lowest cost, with no economic consideration of emissions value. Retail providers will then be required to buy TEACs from generators who have them. In a TEAC based model, the market dispatch will not reflect any emissions prices in generator bids.

Additionally, emission leakage under a TEAC model could be significantly greater than under a First Seller or source-based approach. Since there are sufficient low emission supplies within WECC to provide the needed TEACs to satisfy such an approach to a load-based cap, retail providers can simply purchase TEACs from existing low emission generators. The overall mix of generation within WECC would not change; California would simply pay a premium to represent an artificial claim to supporting lower emitting resources. However, no actual support would be recognized in the market dispatch of generating units. For these reasons, the CPUC should reject the suggested method for implementation of a TEAC based cap-and-trade approach.

VII.

CONCLUSION

For the reasons set forth above and in SCE's opening comments, SCE continues to urge the CPUC to adopt a First Seller approach to a cap-and-trade system for California.

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of REPLY BRIEF OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON POINT OF REGULATION ISSUES on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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